

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SYRACUSE MOUNTAINS
CORPORATION,

Plaintiff,

v.

PETRÓLEOS DE VENEZUELA S.A.,

Defendant.

Civil Action No.: 21-cv-2684-VEC

**DECLARATION OF SHAYDA VANCE
IN SUPPORT OF PLAINTIFF’S RESPONSE TO
DEFENDANT’S MOTION FOR ISSUANCE OF LETTERS OF REQUEST**

Pursuant to 28 U.S.C. § 1746, SHAYDA VANCE hereby declares, as follows:

1. I am a member of the bar of this Court and an associate at the law firm of Hughes Hubbard & Reed LLP, counsel for plaintiff Syracuse Mountains Corporation (“Syracuse”) in this action. I submit this declaration in support of Plaintiff’s Response to Defendant’s Motion for Issuance of Letters of Request.

2. I attach hereto as Exhibit 1 a true and correct copy of the “Frequently Asked Questions” section of the U.S. Department of Treasury’s website discussing sanctions against Venezuela.

3. I attach hereto as Exhibit 2 a true and correct copy of the following publicly available documents:

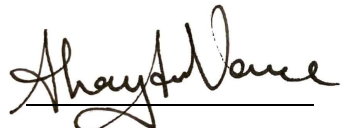
- Notice Regarding Delivery of Financial Statements to the Holders of the 9.00% Notes due 2021, issued by Wilmington Trust Company, as trustee,

on October 8, 2019;

- Notice of Existing Events of Default, Payment Defaults and Delivery of Financial Statements to the Holders of the 12.75% Notes due 2022, issued by Wilmington Trust Company, as trustee, on March 19, 2019;
- Notice of Event of Default to the Holders of the 6.00% Notes due 2026, issued by Delaware Trust Company, as trustee, on December 20, 2017;
- Notice of Event of Default to the Holders of the 5.375% Notes due 2027, issued by Wilmington Trust Company, as trustee, on May 17, 2018;
- FactSet Research Systems summary of the 9.75% Notes due in 2035, indicating that the Notes are in default. FactSet Research Systems is a global provider of integrated financial information, analytical applications and services for the investment and corporate communities; and
- Reuters newspaper article titled “Venezuela’s PDVSA, in default, says total debt remained unchanged in 2019,” dated January 27, 2020.

4. I attach hereto as Exhibit 3 a true and correct copy of a letter from Safra Securities, dated March 26, 2021, authorizing Syracuse to take any and all actions and exercise any and all rights and remedies that the holder of the 5.375% Notes due in 2027 would be entitled to take under the terms of those Notes.

Executed on January 28, 2022
Washington, D.C., United States of America.

By: 
SHAYDA VANCE